

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street, Suite 2700
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com

Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER LLC AND RASIER-CA, LLC'S
ADMINISTRATIVE MOTION TO SEAL
EXHIBIT 1 TO UBER'S MOTION TO
PARTIALLY STRIKE THE REBUTTAL
REPORT OF LINDSEY D. CAMERON,
PH.D.**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

Pursuant to Northern District of California Civil Local Rules 7-11 and 79-5(f)(3), Defendants Uber Technologies Inc., Rasier LLC and Rasier-CA, LLC (collectively, “Uber”) respectfully submit this Administrative Motion (“Motion”) to Seal Exhibit 1 to Uber’s Motion to Partially Strike the Rebuttal Report of Lindsey D. Cameron, Ph.D. Uber has conferred with Plaintiffs, who have stated their position as follows: “Plaintiffs take no position on [Uber’s] redactions and reserve all rights. *See* Declaration of Alexandra Caritis in Support of the Administrative Motion to Seal, ¶ 3. For the reasons set forth herein, good cause exists to seal the redacted version of the following Exhibit:

Document	Description	Party Claiming Confidentiality
Exhibit 1	Redacted Rebuttal Report of Lindsey D. Cameron, Ph.D.	Uber Technologies Inc.; Rasier LLC; Rasier-CA, LLC

I. LEGAL STANDARD

Documents attached to non-dispositive motions that are not directly relevant to the merits of a case are properly sealed when the moving party makes “a particularized showing under the good cause standard of Rule 26(c)” of the Federal Rules of Civil Procedure. *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1180 (9th Cir. 2006) (internal quotations and citations omitted); *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1101-02 (9th Cir. 2016). Rule 26 provides that good cause may exist “to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense[.]” Fed. R. Civ. P. 26(c). In addition to establishing good cause, a party moving to seal documents must explain “why a less restrictive alternative to sealing is not sufficient” and ensure that the request is “narrowly tailored to seal only the sealable material.” Civ L.R. 79-5(c).

II. ARGUMENT

Good cause exists for redacting the requested portions of the Exhibit. The document at issue relates not to a dispositive motion, but to a motion to strike an expert report as an improper rebuttal pursuant to Rule 37(c) of the Federal Rules of Civil Procedure.¹ This motion to seal therefore only needs to meet the

¹ “Consistent with our precedent, we make clear that public access to filed motions and their attachments does not merely depend on whether the motion is technically ‘dispositive.’ Rather, public access will turn on whether the motion is more than tangentially related to the merits of a case. While

1 less exacting “good cause” standard under Rule 26(c).

2 The rebuttal report contains quotations from internal company documents that Uber has produced
 3 in discovery under the Court’s protective order. The limited portions of the report that Uber seeks to redact
 4 concern topics such as Uber’s algorithms, loyalty programs, and other internal projects and initiatives, as
 5 well as discussions revealing internal business strategies. The disclosure of this sensitive information will
 6 result in competitive harm to Uber, since it will reveal information concerning its internal business
 7 strategies. *See Impossible Foods Inc. v. Impossible LLC*, No. 5:21-cv-02419-BLF, 2025 WL 638350, at
 8 *3-4 (N.D. Cal. Feb. 27, 2025) (holding that “confidential business information and internal business
 9 strategy involving Impossible Foods’s trademarks” meets the good cause standard); *Bold Ltd. v. Rocket*
 10 *Resume, Inc.*, No. 22-cv-01045-BLF, 2024 WL 54692, at *3 (N.D. Cal. Jan. 4, 2024) (“The Court finds
 11 good cause to seal the information identified.... These exhibits discuss non-public information about
 12 Bold’s corporate structure and business transactions, which if released would cause Bold competitive
 13 harm.”); *Laatz v. Zazzle, Inc.*, No. 5:22-cv-04844-BLF, 2024 WL 4493441, at *2 (N.D. Cal. Sept. 25,
 14 2024) (“The Court finds that good cause exists to seal Exhibits B and C. The exhibits contain information
 15 related to Zazzle’s business structure, strategies, and practices, public disclosure of which would harm
 16 Zazzle’s competitive standing.”); *Rodman v. Safeway, Inc.*, No. 11-cv-03003-JST, 2013 WL 12320765,
 17 at *2 (N.D. Cal. Oct. 30, 2013) (“Both parties agree that much of the material proposed to be sealed is
 18 internal information not otherwise made available to the public regarding Safeway.com’s pricing
 19 strategies, pricing methodology, internal business strategy, financial performance, and transaction and
 20 customer data. The Court agrees with both parties that exposing this information could subject Defendant
 21 to ‘undue burden or expense,’ and [it] is therefore sealable.”) (internal citation omitted).

22 In addition, Uber is not seeking to seal the full rebuttal report (or even all portions of the report
 23 citing its internal documents), but only to redact very limited excerpts that relate to Uber’s sensitive
 24 internal communications and strategies. *Impossible Foods Inc.*, 2025 WL 638350, at *4 (“Since IF’s
 25 proposed redactions leave unredacted the material relevant to the Parties’ dispute, the Court also finds that
 26

27 many technically nondispositive motions will fail this test, some will pass.” *Ctr. for Auto Safety*, 809 F.3d
 28 at 1101 (internal footnote omitted). Here, the motion to strike—which addresses whether the rebuttal
 report was improper—is only tangentially related to the merits of this case.

IF's proposed redactions are narrowly tailored"). Moreover, to the extent information was already made public in connection with the JCCP trial and other proceedings, Uber is also not seeking to protect that information. Thus, Uber's approach is the least restrictive alternative, and is narrowly tailored to protect Uber's competitive and other interests.

Accordingly, good cause exists for the Court to redact the Exhibit as described above. Uber therefore respectfully requests that the Court order that the redacted Exhibit be maintained on the docket under seal.

DATED: November 5, 2025

Respectfully submitted,

/s/ Laura Vartain Horn

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
 555 California Street, Suite 2700
 San Francisco, CA 94104
 Telephone: (415) 439-1625
 laura.vartain@kirkland.com

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 UBER TECHNOLOGIES, INC.,
 RASIER,LLC, And RASIER-CA, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Laura Vartain Horn

Laura Vartain Horn